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TEXTRON

Textron Inc.Patricia Bisshopp
Environmental Specialist

40 Westminster St. Providence, RI 02903 Tel: (401) 457-2245 Fax: (401) 457-3696 pbisshopp@textron.com www.textron.com

December 30, 2005

Harry Steinmetz U.S. Environmental Protection Agency, Region 3 1650 Arch Street Philadelphia, PA 19103-2029

Re: Safety Light Site, Columbia County, Pennsylvania

Dear Mr. Steinmetz:

Enclosed is the response of Textron Inc. to U.S. EPA's request for information regarding the captioned site. I regret that we are not able to provide more information other than this brief response.

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,

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Enclosure

Response of Textron Inc. to US EPA Information Request Regarding the Safety Light Site, Columbia County, Pennsylvania

Introduction

Relationship between Textron Inc., Bell Aircraft Corporation, and Bell Aerosytems Company

On July 2, 1960, Textron Inc., a Delaware corporation, completed the purchase of certain assets of Bell Aircraft Corporation, a New York Corporation. The purchased assets were:

- Bell Helicopter Corporation, a New York corporation;
- Hydraulic Research and Manufacturing Company, a California corporation;
- Niagara Frontier Division of Bell Aircraft Corporation.

Bell Helicopter Corp. and Hydraulic Research and Manufacturing Company (HR&M) were wholly owned subsidiaries of Bell Aircraft Corp. Niagara Frontier Division was an unincorporated operating division of Bell Aircraft Corp. These three entities were collectively designated the Bell Defense Group.

The Niagara Frontier Division of Bell Aircraft Corporation continued operation as Bell Aerosystems Company, an operating division of Textron Inc, later renamed Bell Aerospace Textron (BAT). The principal operating facility of this Division was located at 2221 Niagara Falls Boulevard, Wheatfield, New York 14304. The business of BAT was transferred to Textron's Systems Division effective as of January 1, 1991. Only records relating to ongoing contracts were retained and transferred to the Systems Division. The Wheatfield property was sold on April 2, 1999.

Textron has no business records relating to the Safety Light Site, other than the three ledger sheets provided by US EPA, which appear to record sales or shipments of material to Bell Aerospace Corp. and Bell Aircraft Corp in, respectively 1961 and 1955. Textron is unable to provide any information regarding persons who are likely to provide relevant information for this time period.

Information Requested

- 1. Textron has no information regarding the business relationship between Bell Aero and Safety Light other than that provided by US EPA.
- 2. Textron has no knowledge of any such transaction.
- 3. Not Applicable.
- 4. See response to Request 2.
- 5. Not Applicable.
- 6. Textron has no knowledge responsive to this request.
- 7. See response to Request 6.
- 8. See response to Request 6.
- 9. Please refer to Introduction. Purchasing records from 1955 (Bell Aircraft) and 1961 (Bell Aerosystems) would not have been retained until the present day. All documents left in the BAT facility in Wheatfield, New York, including Accounts Payable, Accounts Receivable, Workers Compensation records, Engineering Department documents, program documents relating to terminated contracts, time cards, personnel records except those relating to persons receiving pensions, and Outside Procurement (purchasing) were destroyed by March 2004.

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Textron Inc

40 Westminster Street

Providence, RI 02903



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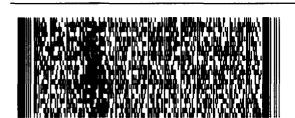
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Harry Steinmetz

U.S. Environmental Protection Agenc 1650 Arch Street

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